

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ISABEL LITOVICH, MICHAEL V. COTTRELL,
FRANK HIRSCH, HOLDCRAFT MARITAL
TRUST, and UNITED FOOD AND COMMERCIAL
WORKERS UNION AND PARTICIPATING FOOD
INDUSTRY EMPLOYERS TRI-STATE PENSION
FUND, on Behalf of Themselves and All Others
Similarly Situated,

Plaintiffs,

v.

BANK OF AMERICA CORPORATION; MERRILL
LYNCH, PIERCE, FENNER & SMITH, INC.; BofA
SECURITIES, INC.; BARCLAYS CAPITAL INC.;
CITIGROUP INC.; CITIGROUP GLOBAL
MARKETS INC.; CREDIT SUISSE SECURITIES
(USA) LLC; DEUTSCHE BANK SECURITIES
INC.; THE GOLDMAN SACHS GROUP, INC.;
GOLDMAN, SACHS & CO., LLC; JPMORGAN
CHASE & CO.; J.P. MORGAN SECURITIES LLC;
MORGAN STANLEY; MORGAN STANLEY &
CO., LLC; MORGAN STANLEY SMITH BARNEY
LLC; NATWEST MARKETS SECURITIES INC.;
WELLS FARGO & CO.; WELLS FARGO
SECURITIES LLC; and WELLS FARGO
CLEARING SERVICES, LLC,

Defendants.

No. 1:20-cv-03154-VEC

NOTICE AND [PROPOSED] ORDER FOR WITHDRAWAL OF COUNSEL

PLEASE TAKE NOTICE that, upon the attached declaration of Robert L. King, and subject to the approval of the Court, Robert L. King hereby withdraws as counsel for Isabel Litovich and shall be removed from the Case Management/Electronic Case Files (CM/ECF) notification list in

the above-captioned action. Randall P. Ewing, Jr., Ryan Zachary Cortazar, Christopher M. Burke, Kate Lv, Stephen M. Tillery, Steven Michael Berezney, Michael E. Klenov, Carol Lee O'Keefe, Chad Emerson Bell, Walter W. Noss, and George A. Zelcs of Korein Tillery will continue to represent Ms. Litovich in this proceeding.

Date: December 28, 2022

By: /s/ Robert L. King

Robert L. King #6209033
THE LAW OFFICE OF ROBERT L. KING
9648 Olive Blvd., Suite 224
St. Louis, MO 63132
(314) 441-6580
king@kinglaw.com

SO ORDERED:

The Honorable Valerie E. Caproni
United States District Judge

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ISABEL LITOVICH, MICHAEL V. COTTRELL,
FRANK HIRSCH, HOLDCRAFT MARITAL
TRUST, and UNITED FOOD AND COMMERCIAL
WORKERS UNION AND PARTICIPATING FOOD
INDUSTRY EMPLOYERS TRI-STATE PENSION
FUND, on Behalf of Themselves and All Others
Similarly Situated,

Plaintiffs,

v.

BANK OF AMERICA CORPORATION; MERRILL
LYNCH, PIERCE, FENNER & SMITH, INC.; BofA
SECURITIES, INC.; BARCLAYS CAPITAL INC.;
CITIGROUP INC.; CITIGROUP GLOBAL
MARKETS INC.; CREDIT SUISSE SECURITIES
(USA) LLC; DEUTSCHE BANK SECURITIES
INC.; THE GOLDMAN SACHS GROUP, INC.;
GOLDMAN, SACHS & CO., LLC; JPMORGAN
CHASE & CO.; J.P. MORGAN SECURITIES LLC;
MORGAN STANLEY; MORGAN STANLEY &
CO., LLC; MORGAN STANLEY SMITH BARNEY
LLC; NATWEST MARKETS SECURITIES INC.;
WELLS FARGO & CO.; WELLS FARGO
SECURITIES LLC; and WELLS FARGO
CLEARING SERVICES, LLC,

Defendants.

No. 1:20-cv-03154-VEC

DECLARATION OF ROBERT L. KING

Robert L. King, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I was an attorney at the law firm Korein Tillery, LLC, counsel for Isabel Litovich in the above-captioned case. I submit this declaration in compliance with Local Rule 1.4 to notify the Court that I am withdrawing as counsel because I left Korein Tillery in June 2021.

2. Randall P. Ewing, Jr., Ryan Zachary Cortazar, Christopher M. Burke, Kate Lv, Stephen M. Tillery, Steven Michael Berezney, Michael E. Klenov, Carol Lee O'Keefe, Chad Emerson Bell, Walter W. Noss, and George A. Zelcs of Korein Tillery will continue to represent Ms. Litovich in this proceeding.

3. My withdrawal will not delay the matter or prejudice any party.

4. I am not retaining or charging a lien.

5. I do not have Ms. Litovich's contact information and therefore request, pursuant to Local Rule 1.4, that the Court excuse me from personally serving Ms. Litovich with this Notice and Declaration, instead permitting service on her above-named counsel of record to suffice.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 28, 2022
St. Louis, Missouri

By: /s/ Robert L. King
Robert L. King

CERTIFICATE OF SERVICE

The undersigned does hereby certify that on December 28, 2022, I caused a true and correct copy of the foregoing to be served upon all parties to this litigation via the CM/ECF system.

By: /s Robert L. King
Robert L. King